REMARKS

Claims 1, 6, 11, and 16 are amended. Claims 3, 10, and 15 are canceled without prejudice or disclaimer. Claims 4-5 and 18-19 were previously canceled without prejudice or disclaimer. No new matter is added by these amendments. Claims 1-2, 6-9, 11-14, 16-17, and 20 are pending. By amending and canceling the claims, applicants are not conceding that the claims are non-statutory under 35 U.S.C. 102 and are not conceding that the claims are unpatentable over the art cited by the Examiner, as the claim amendments are only for the purpose of facilitating expeditious prosecution. Applicant respectfully reserves the right to pursue these and other claims in one or more continuations and/or divisional applications. Applicant respectfully requests reconsideration and allowance of all claims in view of the amendments above and the remarks that follow.

Rejections under 35 U.S.C. 102

Claims 1-3, 6-17, and 20 are rejected under 35 U.S.C. 102(b) as unpatentable over Sapia ("On Modeling and Predicting Query Behavior in OLAP Systems"). Applicant respectfully submits that the claims are patentable over Sapia because Sapia does not teach or suggest all of the elements of the claims, for the reasons argued below.

Claim 1 recites: "finding a host variable in the previous statement in a history that matches a host variable in the first statement, wherein first data supplied for the host variable in the first statement matches previous data associated with the host variable in the previous statement, wherein the host variable in the previous statement and the host variable in the first statement comprise a variable in a host language that is set to a plurality of values in succession and submitted to a database."

The Office Action relies on "pages 6-7," "section 4.2," and "definitions 4.6" for the host variables of claim 1, argues that "attributes" teach the host variables, and argues that, in Sapia, "the correlation (e.g., distance) between current user queries and queries in

the profile are calculated using host variables (e.g., attributes)". Applicant respectfully disagrees for the following reasons.

First, Sapia does not include a "definitions 4.6" section. Instead, Sapia includes a "1 Introduction" section on page 2-1, a "1.1 Why should we model user behavior?" section on page 2-1, a "1.2 What is so characteristic about user interaction in OLAP systems?" section on page 2-2, a "2 Related Work" section on page 2-3, a "3 Multidimensional Data Model" section on page 2-4, a "4 Modeling the User Behavior" section on page 2-4, a "4.1 Sessions, Queries and Query Prototypes" section on page 2-5, a "4.2 Similarity of Queries" section on page 2-6, a "4.3 User/Task Profiles" section on page 2-7, a "4.4 Graphical representation" section on page 2-7, a "5 An Architecture for the Prediction of User Behavior" section on page 2-8, and a "6 Conclusions and Future Work" section on page 2-9.

Second, Sapia at section 4.2 and pages 2-6 and 2-7 does not teach or suggest "attributes." Instead, Sapia at section 4.2 and pages 2-6 and 2-7 describes that "two sessions have a common pattern if they contain similar queries," and similarity of queries is defined by "a distance measure that corresponds to the number of user interactions minimally needed to transform the query prototype of query q_1 to the prototype of q_2," as recited in Sapia section 4.2, first full paragraph.

Third, the Sapia distance is not calculated based on host variables and is not calculated based on "attributes." Instead, the Sapia distance is calculated based on "the number of user interactions minimally needed to transform the query prototype of query q_1 to the prototype of q_2." Thus, the Sapia distance is calculated based on a number of user interactions and not on "attributes."

Finally, the Sapia distance does not teach or suggest "a variable in a host language that is set to a plurality of values in succession and submitted to a database," as recited in claim 1 because the Sapia distance is the number of operations needed to transform query prototypes, as described in Sapia at page 2-4, last full paragraph and not a variable in a host language set to a plurality of values in succession.

Claim 1 further recites: "predicting a second statement based on the previous statement, wherein the predicting further comprises finding the previous statement in the history and finding the second statement that was next in time following the previous statement in the history, wherein the previous statement and the second statement comprise commands that were previously executed against the database."

Thus, claim 1 predicts the second statement by finding it next in time following the previous statement in the history, and the previous statement has a correlation to the first statement, where the previous statement and the second statement comprise commands previously executed against a database.

In contrast, Sapia performs its prediction based on "the status of the current session (the queries asked so for) and the profile information," as described in Sepia on page 2-9, first partial paragraph, which does not teach or suggest "finding the previous statement in the history and finding the second statement that was next in time following the previous statement in the history," as recited in claim 1.

Thus, Sapia does not teach or suggest all the elements of claim 1.

Independent claims 6, 11, and 16 include similar elements as argued above for claim 1 and are patentable over Sapia for similar reasons. Claims 2, 7-9, 12-14, 17, and 20 are dependent on claims 1, 6, 11, and 16, respectively, and are patentable for the reasons argued above, plus the elements in the claims.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is requested. The Examiner is invited to telephone applicant's attorney (651-645-7135) to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 09-0465.

Respectfully submitted,

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By their Representative,

Date: July 20, 2007

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CERTIFICATE UNDER 37 CFR 1.8: I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on July 20, 2007.

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